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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

* * *

NML CAPITAL LTD.,

Plaintiff,

vs.

THE REPUBLIC OF ARGENTINA,

Defendants.

CASE NO.: 2-14-cv-01573-LDG-PAL

DECLARATION OF EDMUND WARD FOR USE IN SUPPORT OF NONPARTY VAL DE LOIRE, LLC'S MOTION TO QUASH SUBPOEAN OR, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER

DECLARATION OF EDMUND WAR FOR USE IN SUPPORT OF NONPARTY VAL DE LOIRE, LLC'S MOTION TO QUASH SUBPOENA OR, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER

I, EDMUND WARD, hereby declare as follows:

1. I am over the age of eighteen years old, of sound mind and have never been convicted of a felony or any crime involving moral turpitude.

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- I have personal knowledge of all events set forth herein, unless stated upon 2. information and belief, as to those statements, I believe them to be true.
- I am the manager and authorized representative for Val de Loire, LLC ("VDL"), a 3. Nevada limited liability company.
- VDL was served with a subpoena by NML Capital Limited, Ltd. ("NML") wherein NML requests production of certain category of documents and, pursuant to Fed.R.Civ.P. 30(b)(6) and Fed.R.Civ.P. 45, notice of the deposition of VDL's designated representative.
- 5. VDL does not have any authorized representative that resides, is employed, or regularly conducts business in person in Nevada or within 100 miles of this Court's jurisdiction.
- I do not reside, am not employed or regularly conduct business in person in Nevada or within 100 miles of this Court's jurisdiction.
- VDL does not have an office in Nevada or within 100 miles of this Court's 7. jurisdiction or the location of the proposed deposition.
- 8. VDL is a holding entity of Argentinian companies currently conducting business operations in the said country.

Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.